

UNITED STATES DISTRICT IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

FLAME S.A.,)	
)	
Plaintiff,)	Civil Action No: 2:13-cv-658
)	2:13-cv-704
GLORY WEALTH SHIPPING PTE LTD.)	
)	
Consolidated Plaintiff,)	
vs.)	
)	NOTICE OF EMERGENT MOTION
INDUSTRIAL CARRIERS, INC.)	
VISTA SHIPPING, INC., and)	
FREIGHT BULK PTE. LTD.,)	
)	
Defendants.)	

Specially appearing Defendant, FREIGHT BULK PTE. LTD. (hereinafter “FBP” or “Defendant”), by and through the undersigned counsel, will move this Court before the Honorable Robert G. Doumar, United States District Judge, at the Walter E. Hoffman, United States Courthouse, 600 Granby Street, Norfolk, VA 23510, at a date and time to be determined by the Court, for an Order: directing Plaintiff Flame S.A. to pay the *custodia legis* expenses incurred to date and which will continue to be incurred in connection with the attachment of the M/V CAPE VIEWER, and granting such other and further relief as may be just, equitable, and proper under the circumstances.

Dated: January 16, 2014
Oyster Bay, New York

Respectfully submitted,

CHALOS & Co, P.C.

By: /s/ George M. Chalos
George M. Chalos, Esq.
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-AND-

DAVEY & BROGAN, P.C.

/s/ Patrick M. Brogan
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Attorneys for Defendant
FREIGHT BULK PTE. LTD.

CERTIFICATE OF SERVICE

I hereby certify that on January 16, 2014, I electronically transmitted and caused to be served upon all counsel of record, the foregoing Notice of Emergent Motion to Compel Payment of *Custodia Legis* Expenses, using the CM/ECF System for the Eastern District of Virginia and/or via e-mail.

DAVEY & BROGAN, P.C.

/s/ Patrick M. Brogan

Mr. Patrick M. Brogan (VSB No. 25568)

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